

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA,)	
)	
Plaintiff)	
v.)	Case No. 1:08cr62 (GBL)
)	
GONS GUTIERREZ NACHMAN,)	
)	
Defendant.)	

**DEFENDANT’S MOTION FOR PRE-TRIAL PRODUCTION OF
JENCK’S ACT MATERIAL (18 U.S.C. §3500)**

NOW COMES Defendant, by and through his undersigned counsel, and hereby requests this Honorable Court enter an Order directing the government to produce all Jenck’s Act materials regarding non-testifying witnesses. (*See United States v. Klauber*, 611 F.2d 512, 515 (4th Cir. 1979).)

Wherefore, Defendant hereby requests this Honorable Court enter an Order directing the government to produce four (4) weeks before trial all written statements or a complete and accurate summary of any oral statement of any individual the government has interviewed but will not call as a witness at trial in this matter. Defendant requests that this Court enter a further Order directing the government to adhere to its continuing obligation to tender such materials upon receipt.

Respectfully submitted,

GONS GUTIERREZ NACHMAN

By: /s/
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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of March, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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